



February 22, 2017

Ms. Erin McCoy  
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Subject:       **Final Focused Feasibility Study**  
                  **Des Moines TCE NPL Site, Operable Unit 02/04, Building Demolition**  
                  **Des Moines, Iowa**  
                  **U.S. EPA Region 7 START 4, Contract No. EP-S7-13-06, Task Order No. 0144**  
                  **Task Monitor: Erin McCoy**

Dear Ms. McCoy:

Tetra Tech, Inc. is submitting the attached final Focused Feasibility Study report regarding the Des Moines TCE NPL site, Operable Unit 02/04, Building Demolition, in Des Moines, Iowa. The report has been updated based on comments received January 5 and 27, 2017. If you have any questions or comments, please contact me at (816) 412-1767.

Sincerely,

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START Project Manager

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START Program Manager

Enclosures

cc:       Debra Dorsey, START Project Officer (cover letter only)

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**DES MOINES TCE NPL SITE  
OPERABLE UNIT 02/04  
BUILDING DEMOLITION  
DES MOINES, IOWA  
FINAL FOCUSED FEASIBILITY STUDY**

**Superfund Technical Assessment and Response Team (START) 4**

**Contract No. EP-S7-13-06, Task Order 0144**

Prepared For:

U.S. Environmental Protection Agency  
Region 7  
11201 Renner Blvd.  
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February 22, 2017

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## ACRONYMS

AOC	Area of contamination
ARAR	Applicable or relevant and appropriate requirement
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	<i>Code of Federal Regulations</i>
COC	Chemical of concern
DICO	DICO, Inc.
EPA	U.S. Environmental Protection Agency
FS	Feasibility study
HDPE	High-density polyethylene
IAC	<i>Iowa Administrative Code</i>
IC	Institutional control
KDHE	Kansas Department of Health and Environment
LDR	Land disposal restriction
mil	0.001 inch
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NESHAPS	National Emission Standards for Hazardous Air Pollutants
O&M	Operations and maintenance
OMB	Office of Management and Budget
OU	Operable unit
PCB	Polychlorinated biphenyl
PCE	Tetrachloroethene
ppm	Parts per million
RAO	Remedial Action Objective
RACER	Remedial Action Cost Engineering and Requirements
RCRA	Resource Conservation and Recovery Act
ROD	Record of Decision
SPA	South Pond Area
START	Superfund Technical Assistance and Response Team
TBD	To be determined
TCE	Trichloroethene
Tetra Tech	Tetra Tech, Inc.
TSCA	Toxic Substances Control Act
US	United States
U.S.C.	<i>United States Code</i>

## 1.0 INTRODUCTION

The U.S. Environmental Protection Agency (EPA) directed the Tetra Tech Inc. (Tetra Tech) Superfund Technical Assessment and Response Team (START) to prepare a Focused Feasibility Study (FS) report regarding the Des Moines Trichloroethene (TCE) Site (site) in Des Moines, Iowa (Figure 1). An FS is a mechanism for developing, screening, and evaluating alternatives for remedial actions to address risk identified during previous site investigations. The purpose of this Focused FS is to support an update of the 1996 FS prepared by Black and Veatch (Black and Veatch Special Projects Corp. [Black and Veatch] 1996). This Focused FS addresses Operable Unit (OU) 02/04 related to the buildings. An FS addressing the “South Pond Area” (SPA) will be submitted under separate cover.

The site is in south-central Des Moines on the east side of the Raccoon River (Figure 1). The site is a 43-acre property formerly operated by DICO, Inc. (DICO). It is southwest of the intersection of W. Martin Luther King Jr. Parkway and SW 16<sup>th</sup> Street in Des Moines, Polk County, Iowa. The site is within Section 8, Township 78 North, Range 42 West. The site, as outlined in the 1996 Record of Decision (ROD), includes Buildings 1, 2, and 3; and slab foundations remaining for the Maintenance Building and Buildings 4 and 5. For the purposes of this Focused FS, the Office Building and Production Building are also included as part of the site. A surface water feature at the south end of the site is referred to as the SPA. The SPA was identified in the 1996 FS as part of OU4, called the South Pond/Drainage Area Source Control OU. It was delineated to address pesticide contamination in soils and buildings in the southeast portion of the site.

For approximately 40 years, historical operations at the site have included a variety of industrial uses and operations—steel wheel manufacturing, chemical and herbicide distribution, and pesticide formulation processes. Releases during DICO’s operations at the site included the following: TCE, 1,2-dichloroethene (DCE), and vinyl chloride in groundwater; residual pesticides and metals in shallow soils; and pesticides within buildings and soils on the southern end of the property, and within drainage areas. See the 1996 FS for more information (Black and Veatch 1996). The site is divided into four OUs:

- OU1 – groundwater TCE plume
- OU2 – originated as source soils associated with TCE groundwater contamination, but later focused on residual pesticides and metals in shallow soils and polychlorinated biphenyls (PCB) in buildings
- OU3 – source area of tetrachloroethene (PCE) groundwater contamination north of the site
- OU4 – pesticides in soil and buildings on the southern end of the site (a.k.a., SPA), and in

drainage areas of the site.

The 1986 ROD addressed OU1 (EPA 1986), the 1992 ROD addressed OU3 (EPA 1992), and the 1996 ROD addressed OU2 and OU4 (EPA 1996). The 1996 ROD for OU4 selected Building Alternative 2 – Limited Action and Soil Alternative 2 – Limited Action. Under these remedies, contamination within and underneath the buildings would remain in place and exposure to the contamination would be controlled through land use controls (both engineered controls and institutional controls). In the mid-1990s, several cleanup actions occurred to address contamination at the site in surface soils and buildings. Furthermore, a group of potentially responsible parties excavated contaminated soils from a drainage ditch adjacent to the site and from the SPA (EPA 2012).

Manufacturing operations at the site have ceased, and the only activities on site relate to operation and maintenance of remediation systems. The site is fenced, and the property owner provides site security.

Land use in the surrounding area is changing, and much of this area has been rezoned since the remedy was selected for OU4 in the 1996 ROD. The City of Des Moines is planning a major redevelopment project in the River Point West area east of the site. Due to the changing land use, this Focused FS report evaluates alternatives for addressing human health risk associated with buildings and slabs that remain on site in a way that is compatible with changing land use. This Focused FS report addresses the buildings and slabs that remain on site and does not include an evaluation of alternatives to address contaminated soil beneath the buildings and slabs. The remedy selected for the contaminated soil beneath the buildings and slabs in the 1996 ROD remains in place and has been determined to be protective of human health and the environment. Figure 2 is a site layout map.

This Focused FS report was prepared in accordance with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) and EPA's Guidance for Conducting Remedial Investigations and Feasibility Studies under CERCLA (EPA 1988). The NCP defines appropriate remediation as a cost-effective remedial alternative that effectively mitigates and minimizes threats to and provides adequate protection of human health, welfare, and the environment. Remedial alternatives evaluated in this Focused FS report vary in cost and in level of protection they afford to human health.



## **2.0 REMEDIAL ACTION OBJECTIVES AND PRELIMINARY REMEDIATION GOALS**

Several pesticides were detected in samples of building materials and concrete, and in wipe samples. Pesticides detected in the slab foundations of the Maintenance Building and Building 4 contained Resource Conservation and Recovery Act (RCRA) listed wastes as a result of spills of listed waste when Aldrin (Hazardous Waste Code P004) stored in the Maintenance Building was transferred to Building 4 and sprayed onto fertilizer. A 2,000-gallon vessel stored in the Maintenance Building was used to heat Aldrin during formulation operations (Eckenfelder Inc. 1992).

It is unclear if contamination within the remaining buildings and slab foundations on site derived from poor waste management or releases of product that is not RCRA listed waste. Therefore, the source is unknown and is not considered a RCRA listed waste. Pesticides detected in these other buildings and slab foundations may contain RCRA characteristic waste and therefore would be characterized prior to disposal. Remedial action objectives (RAO) were developed to address the demolition and disposal of building materials only and do not address soil in this Focused FS.

The general RAO specified in the 1996 ROD is as follows:

“Maintain the Buildings, asphalt cap, and SPA so that exposure pathways continue to be controlled or minimized. This will minimize risk for both the current and anticipated future industrial use of the site, and will protect human health and the environment.”

The specific RAO, listed in the 1996 ROD, related to the nature and extent of contamination in buildings at the site is as follows:

“To maintain control of potential exposure pathways related to contaminated materials in Buildings 1 through 5 and the Maintenance Building, and to protect human health and the environment during continued and future industrial uses.”

An RAO was not developed in this Focused FS because no new or additional environmental media, exposure pathways, or receptors were identified since the 1996 ROD. The RAOs identified in the 1996 ROD remain protective of human health and the environment for OU4.

### **3.0 EXTENT OF CONTAMINATION**

In July 2016, Tetra Tech conducted an environmental characterization of buildings, foundations, soil below buildings, and the SPA. The South Pond characterization is included under separate cover in the South Pond FS (Tetra Tech 2016b). The building investigation included collection of the following samples for analyses for chemicals of concern (COC):

- Wipe samples from building surfaces
- Building material samples
- Concrete core samples from building foundations and slabs.

Results of the site characterization indicated presence of pesticides, PCBs, and dioxins in several building materials across the site. Pesticides and PCB sample locations are shown on Figures 3 through 5; analytical summary tables of pesticides and PCBs (Tables 1 through 3) correspond to each figure.

#### **4.0 APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS**

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section (§) 121(d)(1) requires that remedial actions attain (or the decision document justify waiver of) environmental regulations, standards, or criteria promulgated under federal or more stringent state laws determined to be applicable or relevant and appropriate requirements (ARAR).

The NCP at 40 *Code of Federal Regulations* (CFR) § 300.5 defines applicable requirements as “those cleanup standards, standards of control, and other substantive requirements, criteria, or limitations promulgated under federal environmental or state environmental or facility siting laws that specifically address a hazardous substance, pollutant, contaminant, remedial action, location or other circumstance found at a CERCLA site...” The NCP at 40 CFR § 300.5 defines relevant and appropriate requirements as “those cleanup standards, standards of control, and other substantive requirements, criteria, or limitations promulgated under federal environmental or state environmental or facility siting laws that, while not ‘applicable’ to a hazardous substance, pollutant, contaminant, remedial action, location, or other circumstance at a CERCLA site, address problems or situations *sufficiently similar to those encountered at the CERCLA site and that their use is well suited to the particular site...*” (emphasis added).

Compliance with ARARs requires compliance only with the substantive requirements specified within the statute or regulation, and does not require compliance with procedural requirements, such as permitting. CERCLA § 121(e)(1) states that “No Federal, State, or local permit shall be required for the portion of any removal or remedial action conducted entirely onsite, where such remedial action is selected and carried out in compliance with this section.” For any portion of a removal or remedial action conducted off site, such as off-site disposal in a permitted landfill, compliance only with applicable requirements is necessary (not relevant and appropriate), and compliance with both substantive and procedural components is required.

Potential federal and state ARARs are identified in this FS. Potential federal ARARs were identified based on a review of site-specific characteristics and remedial actions under evaluation, and federal environmental statutes and regulations. Potential state ARARs were identified based on a review of site-specific characteristics and remedial actions under evaluation, and state-delegated environmental programs and other state environmental statutes and regulations. For a state requirement, including an applicable state requirement, to be identified as a potential state ARAR, the state requirement must be more stringent than the corresponding federal ARAR. EPA will select the final ARARs (no longer potential) in the ROD.

ARARs are generally divided into three categories: chemical-, location-, and action-specific requirements. Chemical-specific ARARs are generally health- or risk-based numerical values or methodologies applied to site-specific conditions that result in establishment of cleanup levels. These values establish acceptable amounts or concentrations of chemicals that may be found in, or discharged to, the ambient environment. Chemicals found in the buildings and building materials include pesticides, PCBs, and dioxins. No statutory or regulatory standards for pesticides or dioxins in building debris have been established that specify potential cleanup levels. PCBs found in the building material are in bulk product waste and are not considered PCB remediation waste. The regulations specified in 40 CFR § 761.61—including the PCB self-implementing cleanup option in 40 CFR § 761.61(a)(4)(i), which specifies numerical standards that may be used as cleanup standards at CERCLA sites—were not identified as potential ARARs because no PCB remediation waste is present in the buildings. As a result, no potential chemical-specific ARARs were identified. Location-specific ARARs are restrictions or requirements placed on protected locations, including historic places, wetlands, and sensitive ecosystems or habitats. The site is not within a floodplain due to presence of a levee. However, the site is surrounded by a floodplain, potential location-specific ARARs were identified for protection of permanent and temporary facilities constructed at the site. No other protected or regulated resources are present at the building site, so no other potential location-specific ARARs were identified. Potential federal location-specific ARARs are identified in Table 1. No potential state location-specific ARARs were identified for protection of the floodplain. Potential Action-specific ARARs are requirements triggered by a remedial action on site. Action-specific ARARs generally do not determine the remedial alternative; rather, they determine how an alternative must be completed. No potential action-specific ARARs were identified for or are necessary for the No Action alternative. Potential federal action-specific ARARs are listed in Table 2. Potential state action-specific ARARs are listed in Table 3. Table 4 summarizes feasibility options.

TABLE 1

**POTENTIAL FEDERAL LOCATION-SPECIFIC APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS  
DES MOINES TCE SITE, DES MOINES, IOWA**

Action	Requirement	Prerequisite	Citation	Preliminary ARAR Determination	Comments
Construction of temporary staging pile and construction of permanent cover over contaminated soil and fill	Federal agencies must evaluate potential effects of action they may take in a floodplain and avoid adverse effects to the extent possible. Federal agencies must implement acceptable floodproofing and other flood protection measures for new facilities constructed in a floodplain.	Construction of a structure or facility in a floodplain	Executive Order 11988	Not an ARAR	Executive Orders are not legally enforceable, and therefore are not identified as potential ARARs. As a result, this Executive Order was evaluated as TBC.  Because the area surrounding the site is within the floodplain, this Executive Order is identified as TBC for construction of temporary staging piles and the permanent cover over contaminated soil and fill. These facilities are necessary for implementation of the remedial action and both will be designed to prevent washout.
<b>Resource Conservation and Recovery Act</b>					
Construction of temporary staging pile and construction of permanent cover over contaminated soil and fill	A hazardous waste facility within a 100-year floodplain must be designed, constructed, operated, and maintained to prevent washout by a 100-year flood, unless the owner or operator can demonstrate procedures in effect that will safely remove the waste, before flood waters can reach the facility.	Construction of new RCRA hazardous waste facility within a 100-year floodplain	40 CFR § 264.18(b)	Relevant and appropriate	Because the area surrounding the site is within the floodplain, these requirements are identified as ARARs for construction of temporary staging piles and the permanent cover over contaminated soil and fill.

Notes:

§ Section  
ARAR Applicable or relevant and appropriate requirement  
CFR Code of Federal Regulations  
RCRA Resource Conservation and Recovery Act  
TBC To be considered criteria

TABLE 2

**POTENTIAL FEDERAL ACTION-SPECIFIC APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS  
DES MOINES TCE SITE, DES MOINES, IOWA**

Action	Requirement	Prerequisite	Citation	Preliminary ARAR Determination	Comments
<b>ALTERNATIVES</b>					
<b>Building Demolition with Off-Site Disposal (Alternative 2)</b>					
<b>Resource Conservation and Recovery Act</b>					
Generate waste	A solid waste exhibits the characteristic of toxicity if, by use of the toxicity characteristic leaching procedure, the extract from a representative sample of the waste contains any contaminant listed in Table 1, and concentration equals or exceeds the benchmark value for that contaminant listed in Table 1.	Waste	40 CFR § 261.24	Applicable	This regulation is potentially applicable to off-site disposal of building debris that would be waste, and any other waste generated during the remedial action. Waste associated with the foundations of Building 4 and the Maintenance Building is considered RCRA listed waste and would not be subject to this potential ARAR. Demolition waste associated with other buildings is not considered listed waste because it was not contaminated by a spill of listed waste. The demolition waste associated with other buildings would be subject to this potential ARAR and would be characterized to determine if it meets the definition of toxicity characteristic waste.
Generate waste	Discarded commercial chemical products, off-specification species, container residues, and spill residues are considered P-listed hazardous waste and U-listed hazardous waste.	Waste	40 CFR § 261.33	Applicable	This regulation is potentially applicable to off-site disposal of waste. Waste associated with the foundations of Building 4 and the Maintenance Building is considered P- and U-listed waste.
Generate waste	Person who generates waste shall determine if the waste is a RCRA hazardous waste.	Generator of waste	40 CFR §§ 262.10(a), 262.11	Applicable	These regulations are potentially applicable to off-site disposal of building debris that would be waste, and any other waste generated during the remedial action. Waste would be characterized prior to shipment off-site for disposal. Waste associated with the foundations of Building 4 and the Maintenance Building is considered RCRA listed waste. Waste associated with other buildings is not considered listed waste because it was not contaminated by a spill of listed waste. The demolition waste associated with other buildings would be characterized to determine if it meets the definition of RCRA characteristic waste.
Generate waste	Provides requirements for analyzing waste for determining whether waste is hazardous.	Generator of waste	40 CFR § 264.13	Applicable	These regulations are potentially applicable to off-site disposal of building debris that would be waste, and any other waste generated during the remedial action. Waste would be characterized prior to shipment off-site for

**TABLE 2 (Continued)**

**POTENTIAL FEDERAL ACTION-SPECIFIC APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS  
DES MOINES TCE SITE, DES MOINES, IOWA**

Temporarily stage debris for off-site disposal	Allows generators to accumulate solid remediation waste in a staging pile designed and operated pursuant to these requirements without triggering LDRs or minimum technology requirements. In addition, activities intended to prepare the waste for subsequent management or treatment are allowed to occur in staging piles.	RCRA hazardous waste temporarily staged for off-site disposal	40 CFR §264.554	Applicable and Relevant and appropriate	disposal.  The building debris would be temporarily staged in order to segregate the various waste streams prior to off-site disposal.  Waste associated with the foundations of the Building 4 and of the Maintenance Building are contaminated as a result of spills of listed waste; thus these foundations contain listed waste and must be managed as listed waste. Debris from the foundations will be temporarily stored in a staging pile prior to off-site disposal. The staging pile regulations would be applicable to the demolition waste associated with Building 4 and the Maintenance Building. Building debris from other buildings does not contain listed waste, but may contain RCRA characteristic waste. Because characterization of the waste is not fully known, the staging pile regulations would be relevant and appropriate requirements for the demolition waste associated with other buildings.
Close temporary staging pile and construct cover over contaminated soil and fill remaining on site	The owner or operator must close the facility in a manner that minimizes need for further maintenance; and controls, minimizes, or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground or surface water or atmosphere.	RCRA hazardous waste management facility	40 CFR § 264.111	Applicable	These requirements are potential ARARs for closing the temporary staging pile.  These requirements are also applicable for leaving RCRA listed hazardous waste (soil underneath Building 4 and the Maintenance Building) and leaving RCRA characteristic waste (soil underneath other buildings on the site) closed in place.
Construct cover over contaminated soil and fill remaining on site	Post-closure use of the property on or in which hazardous waste remains after partial or final closure must never be allowed to disturb the integrity of the final cover, liner, or any other components of the containment system, or function of the facility's monitoring systems.	RCRA hazardous waste management facility	40 CFR § 264.117(c)	Applicable	These requirements are applicable for leaving RCRA listed hazardous waste (soil underneath Building 4 and the Maintenance Building) and leaving RCRA characteristic waste (soil underneath other buildings on the site) closed in place.

**TABLE 2 (Continued)**

**POTENTIAL FEDERAL ACTION-SPECIFIC APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS  
DES MOINES TCE SITE, DES MOINES, IOWA**

Construct cover over contaminated soil and fill remaining on site	A map must be prepared showing exact location and dimensions of each waste management cell with respect to permanently surveyed benchmarks.	RCRA hazardous waste landfill	40 CFR § 264.309(a)	Applicable	These requirements are applicable for leaving RCRA listed hazardous waste (building debris) closed in place.
Construct cover over contaminated soil and fill remaining on site	Final cover design and construction requirements.	RCRA hazardous waste landfill	40 CFR §264.310	Applicable	These requirements are applicable for leaving RCRA listed hazardous waste (soil underneath Building 4 and the Maintenance Building) and leaving RCRA characteristic waste (soil underneath other buildings on the site) closed in place.
Close temporary staging pile and construct cover over contaminated soil and fill remaining on site.	At closure, owner shall remove or decontaminate all waste residues, contaminated containment system components, contaminated subsoils, and structures and equipment contaminated with waste and leachate, and manage them as hazardous waste. If waste is left on site, post-closure care shall be performed in accordance with the closure and post-closure care requirements that apply to landfills.	RCRA hazardous waste pile	40 CFR § 264.258(a)	Applicable	These requirements are potential ARARs for closing the temporary staging pile.  These requirements are also applicable for leaving RCRA listed hazardous waste (soil underneath Building 4 and the Maintenance Building) and leaving RCRA characteristic waste (soil underneath other buildings on the site) closed in place.
Monitor groundwater	Owners and operators of landfills that dispose of hazardous waste must implement a groundwater monitoring program to detect, characterize, and respond to releases to the uppermost aquifer unless the owner or operator is exempt from this requirement, including a finding of no potential for migration of liquid from a regulated unit to the uppermost aquifer during the active life of the regulated unit and the post-closure period.	RCRA hazardous waste landfill	40 CFR §§ 264.90 and 264.91	Applicable	These requirements are applicable to RCRA hazardous waste disposal sites. These regulations require groundwater monitoring unless the owner or operator falls within an exception, including a finding of no potential for migration of liquids into groundwater.
Generate waste	A generator of waste shall	Waste	40 CFR § 268.7	Applicable	These regulations are potentially applicable to waste,



TABLE 2 (Continued)

**POTENTIAL FEDERAL ACTION-SPECIFIC APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS  
DES MOINES TCE SITE, DES MOINES, IOWA**

	determine if the waste has to be treated before it can be land disposed, which may occur concurrently with the hazardous waste determination required in 40 CFR § 262.11.				including the building debris, to be sent off site for disposal. The waste would be characterized and a determination regarding required treatment would be made prior to off-site disposal.
Generate waste	The initial generator of a waste shall determine each EPA hazardous waste number (waste code) in order to determine the applicable treatment standards, which may occur concurrently with the hazardous waste determination required in 40 CFR § 262.11.	Waste	40 CFR § 268.9	Applicable	These regulations are potentially applicable to waste, including the building debris, to be sent off site for disposal. The waste would be characterized and a determination would be made regarding required treatment prior to off-site disposal.
Generate waste	EPA may grant variance from an LDR treatment standard.	RCRA hazardous waste subject to LDRs	40 CFR § 268.44	Applicable	These regulations are potentially applicable to waste, including the building debris to be sent off site for disposal that contains the listed waste or meets the definition of RCRA characteristic waste. If necessary and appropriate, a determination may be made that a treatment variance is appropriate.
Generate waste	Treatment standards for hazardous debris.	RCRA hazardous waste subject to LDRs	40 CFR § 268.45	Applicable	Hazardous debris must be treated prior to land disposal unless, pursuant to 40 CFR § 261.3(f)(2), the debris no longer contains hazardous waste or the debris is treated to the waste-specific treatment standards specified in 40 CFR § 268.45. Demolition debris from other buildings may meet the definition of characteristic waste. Demolition debris from Building 4 and the Maintenance Building and demolition debris that meets the definition of characteristic waste will be treated prior to land disposal.
<b>Clean Air Act</b>					
Building demolition	Owner or operator of a demolition or renovation activity must thoroughly inspect the affected facility where the demolition will occur for presence of asbestos. If asbestos is found, the owner or operator must comply with the notification requirements of 40 CFR § 61.145(b) and the procedures for asbestos	Demolition of any institutional, commercial, public, industrial, or residential structure with less than four units	40 CFR § 61.145	Applicable	The substantive provisions of the NESHAPS for asbestos are applicable to demolition of the building. An asbestos survey will be completed prior to demolition of the building. If asbestos-containing materials are found, the demolition must comply with the substantive procedures in 40 CFR § 61.145(c).

TABLE 2 (Continued)

**POTENTIAL FEDERAL ACTION-SPECIFIC APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS  
DES MOINES TCE SITE, DES MOINES, IOWA**

	emission control specified in 40 CFR § 61.145(c).				
Building demolition	Each owner or operator of a source must (1) discharge no visible emissions to the outside air during collection, processing, packaging, and transporting; (2) deposit the asbestos-containing waste at the waste disposal site as soon as is practical; (3) mark vehicles used to transport asbestos-containing waste; (4) maintain transportation records; and (5) make records available for inspection.	Owner or operator of a source of asbestos emissions (including a source regulated under 40 CFR § 61.145)	40 CFR § 61.150	Applicable	The substantive provisions of the NESHAPs for asbestos disposal are applicable to asbestos-containing waste identified in the building demolition.
<b>Toxic Substances Control Act</b>					
Building demolition	PCB bulk product waste must be disposed of in accordance with (1) performance-based disposal, (2) disposal in solid waste landfills, or (3) risk-based disposal approval.	PCB bulk product waste means waste derived from manufactured products containing PCBs in a non-liquid state, at any concentration at time of designation for disposal $\geq 50$ ppm PCBs	40 CFR § 761.62(b)	Relevant and appropriate	In the promulgation of the TSCA rule at 40 CFR § 761.61, EPA stated that Part 761 does not bind other cleanup programs such as CERCLA or RCRA; however, EPA expects that CERCLA cleanups would typically comply with one of the three cleanup options provided in § 761.61. Therefore, this regulation, which is within Part 761, is not identified as applicable, but is identified as relevant and appropriate to PCBs present in building materials from manufactured products (not as a result of a spill). PCB bulk product waste may be present in the building materials. If so, the building materials would be disposed of at an appropriate solid waste landfill.
Building demolition	Requirements for sampling non-liquid, non-metal PCB bulk product waste for purposes of characterization for PCB disposal in accordance with 40 CFR § 761.62	PCB bulk product waste means waste derived from manufactured products containing PCBs in a non-liquid state, at any concentration at time of designation for	40 CFR §§ 761.340 through 761.359 (Subpart R)	Relevant and appropriate	PCB bulk product waste may be present in the building materials. Sampling the building materials for PCB bulk product waste would be completed according to these requirements.

TABLE 2 (Continued)

**POTENTIAL FEDERAL ACTION-SPECIFIC APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS  
DES MOINES TCE SITE, DES MOINES, IOWA**

		disposal ≥ 50 ppm PCBs			
Building demolition	Procedure for double wash/rinse method for decontaminating non- porous surfaces	PCB bulk product waste means waste derived from manufactured products containing PCBs in a non-liquid state, at any concentration at time of designation for disposal ≥ 50 ppm PCBs	40 CFR §§ 761.360 through 761.378	Relevant and appropriate	PCB bulk product waste may be present in the building materials. Non-porous surfaces of PCB bulk product waste may be decontaminated using this method prior to disposal.
<b>Clean Water Act</b>					
Building demolition and construction of the cap	Construction activities that disturb 1 acre or more must use best management practices to control stormwater discharges.	Construction activities affecting at least 1 acre.	Clean Water Act § 402 40 CFR §122.44(k)(2) and (4)	Applicable	Building demolition and construction of the cap will affect at least 1 acre, so the stormwater discharge requirements are applicable. Best management practices will be used to control stormwater discharge to nearby surface water bodies. See Table 3, Potential State ARARs, for a discussion of compliance with these Clean Water Act ARARs.

TABLE 2 (Continued)

**POTENTIAL FEDERAL ACTION-SPECIFIC APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS  
DES MOINES TCE SITE, DES MOINES, IOWA**

Action	Requirement	Prerequisite	Citation	Preliminary ARAR Determination	Comments
<b>ALTERNATIVES</b>					
<b>Building Demolition with On-site Containment (Alternative 3)</b>					
<b>Resource Conservation and Recovery Act</b>					
Generate waste	A solid waste exhibits the characteristic of toxicity if, by application of the toxicity characteristic leaching procedure, the extract from a representative sample of the waste contains contaminant listed in Table 1 at concentration equaling or exceeding the benchmark value for that contaminant listed in Table 1.	Waste	40 CFR § 261.24	Applicable	This regulation is potentially applicable to off-site disposal of waste generated during the remedial action. Waste associated with the foundations of Building 4 and the Maintenance Building is considered RCRA listed waste and would not be subject to this potential ARAR. Waste associated with other buildings is not considered listed waste because it was not contaminated by a spill of listed waste. The demolition waste associated with other buildings would be subject to this potential ARAR and would be characterized to determine if it meets the definition of toxicity characteristic waste.
Generate waste	Discarded commercial chemical products, off-specification species, container residues, and spill residues are considered P-listed hazardous waste and U-listed hazardous waste.	Waste	40 CFR § 261.33	Applicable	This regulation is potentially applicable to off-site disposal of waste generated during the remedial action. Waste associated with the foundations of Building 4 and the Maintenance Building is considered P- and U-listed waste.
Construct covers over crushed building debris left on site	The owner or operator must close the facility in a manner that minimizes need for further maintenance; and controls, minimizes, or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground or surface water or atmosphere.	RCRA hazardous waste management facility	40 CFR § 264.111	Applicable and relevant and appropriate	These requirements are applicable for leaving RCRA listed hazardous waste (foundations of Building 4 and of the Maintenance Building) and other RCRA characteristic hazardous waste closed in place over the southern portion of the site.  These requirements are relevant and appropriate for leaving non-hazardous waste (non-hazardous building debris) closed in place over the northern portion of the site.
Construct covers over crushed building debris left on site	Post-closure use of the property on or in which hazardous waste remains after partial or final closure must never be allowed to disturb the integrity of the final	RCRA hazardous waste management facility	40 CFR § 264.117(c)	Applicable and relevant and appropriate	These requirements are applicable for leaving RCRA listed hazardous waste (foundations of Building 4 and of the Maintenance Building) and other RCRA characteristic hazardous waste closed in place over the southern portion of the site.

TABLE 2 (Continued)

**POTENTIAL FEDERAL ACTION-SPECIFIC APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS  
DES MOINES TCE SITE, DES MOINES, IOWA**

	cover, liner, or any other components of the containment system, or function of the facility's monitoring systems.				These requirements are relevant and appropriate for leaving non-hazardous waste (non-hazardous building debris) closed in place over the northern portion of the site.
Construct covers over crushed building debris left on site	A map must be prepared showing the exact location and dimensions of each waste management cell with respect to permanently surveyed benchmarks.	RCRA hazardous waste landfill	40 CFR § 264.309(a)	Applicable and relevant and appropriate	These requirements are applicable for leaving RCRA listed hazardous waste (foundations of Building 4 and of the Maintenance Building) and other RCRA characteristic hazardous waste closed in place over the southern portion of the site.  These requirements are relevant and appropriate for leaving non-hazardous waste (non-hazardous building debris) closed in place over the northern portion of the site.
Construct cover over crushed building debris left on site	Final cover design and construction requirements.	RCRA hazardous waste landfill	40 CFR §264.310	Applicable	These requirements are applicable for leaving RCRA listed hazardous waste (foundations of Building 4 and of the Maintenance Building) and other RCRA characteristic hazardous waste closed in place over the southern portion of the site.
Monitor groundwater	Owners and operators of landfills that dispose of hazardous waste must implement a groundwater monitoring program to detect, characterize, and respond to releases to the uppermost aquifer unless the owner or operator is exempt from this requirement, including a finding of no potential for migration of liquid from a regulated unit to the uppermost aquifer during the active life of the regulated unit and the post-closure period.	RCRA hazardous waste landfill	40 CFR §§ 264.90 and 264.91	Applicable	These requirements are applicable to RCRA hazardous waste disposal sites, which would include the southern portion of the site. These regulations require groundwater monitoring unless the owner or operator falls within an exception, including a finding of no potential for migration of liquids into groundwater.
Generate waste	Treatment standards for hazardous debris.	RCRA hazardous waste subject to LDRs	40 CFR § 268.45	Applicable	Some hazardous debris would be sent off-site for disposal. Hazardous debris must be treated prior to off-site land disposal unless, pursuant to 40 CFR § 261.3(f)(2), the debris no longer contains hazardous waste or the debris is treated to the waste-specific treatment standards specified in 40 CFR § 268.45.
<b>Clean Air Act</b>					
Building	Owner or operator of a	Demolition of	40 CFR § 61.145	Applicable	The substantive provisions of the NESHAPS for asbestos

TABLE 2 (Continued)

**POTENTIAL FEDERAL ACTION-SPECIFIC APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS  
DES MOINES TCE SITE, DES MOINES, IOWA**

demolition	demolition or renovation activity must thoroughly inspect the affected facility where the demolition will occur for presence of asbestos. If asbestos is found, the owner or operator must comply with the notification requirements of 40 CFR § 61.145(b) and the procedures for asbestos emission control of 40 CFR § 61.145(c).	any institutional, commercial, public, industrial, or residential structure with less than four units			are applicable to demolition of the building. An asbestos survey will be completed prior to demolition of the building. If asbestos-containing materials are found, the demolition must comply with the substantive procedures in 40 CFR § 61.145(c).
Building demolition	Each owner or operator of a source must (1) discharge no visible emissions to the outside air during collection, processing, packaging, and transporting; (2) deposit the asbestos-containing waste at the waste disposal site as soon as is practical; (3) mark vehicles used to transport asbestos-containing waste; (4) maintain transportation records; and (5) make records available for inspection.	Owner or operator of a source of asbestos emissions (including a source regulated under 40 CFR § 61.145)	40 CFR § 61.150	Applicable	The substantive provisions of the NESHAPs for asbestos disposal are applicable to asbestos-containing waste identified in the building demolition. An asbestos survey will be completed prior to demolition of the building. If asbestos-containing materials are found, these will be removed and disposed of off site.
<b>Toxic Substances Control Act</b>					
PCB waste from building demolition	PCB remediation waste in low-occupancy areas may remain at a cleanup site at concentrations > 25 ppm and ≤ 100 ppm if the site is covered with a cap meeting the requirements of paragraphs (a)(7) and (a)(8)	PCB remediation waste at concentrations ≥ 50 ppm PCBs.	40 CFR § 761.61(a)(4)(i)(B)(3)	Relevant and appropriate	In promulgation of the TSCA rule at 40 CFR § 761.61, EPA stated that Part 761 does not bind other cleanup programs such as CERCLA or RCRA; however, EPA expects that CERCLA cleanups would typically comply with one of the three cleanup options provided in § 761.61. Also, the PCBs found at the building demolition site are not from the release of PCBs as PCB remediation waste. Instead, the PCBs found at the building demolition site are PCB bulk product waste. Therefore, this regulation is not identified as applicable, but is identified as relevant and appropriate to PCBs present in bulk product waste. PCB bulk product waste with concentrations of PCBs exceeding 50 ppm will be disposed of off-site. PCB bulk product waste with concentrations at or less than 50 ppm will remain on site, under the cover.

TABLE 2 (Continued)

**POTENTIAL FEDERAL ACTION-SPECIFIC APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS  
DES MOINES TCE SITE, DES MOINES, IOWA**

PCB waste from building demolition	Any person designing and constructing a cap must do so in accordance with 40 CFR § 264.310(a) and ensure that it complies with the permeability, sieve, liquid limit, and plasticity index parameters in § 761.75(b)(1)(ii) through (b)(1)(v). A cap of compacted soil shall have a minimum thickness of 10 inches; a concrete or asphalt cap shall have a minimum thickness of 6 inches. A cap must be of sufficient strength to maintain its effectiveness and integrity when exposed to the environment.	PCB remediation waste at concentrations $\geq$ 50 ppm PCBs.	40 CFR §§ 761.61(a)(7), 761.65(b)(1)(i) through (b)(1)(v)	Relevant and appropriate	In promulgation of the TSCA rule at 40 CFR § 761.61, EPA stated that Part 761 does not bind other cleanup programs such as CERCLA or RCRA; however, EPA expects that CERCLA cleanups would typically comply with one of the three cleanup options provided in § 761.61. Also, the PCBs found at the building demolition site are not from the release of PCBs as PCB remediation waste. Instead, the PCBs found at the building demolition site are PCB bulk product waste. Therefore, these regulations are not identified as applicable, but are identified as relevant and appropriate to PCBs present in a bulk product waste. PCB bulk product waste with concentrations of PCBs exceeding 50 ppm will be disposed of off-site. PCB bulk product waste with concentrations at or less than 50 ppm will remain on site, under the cover. The cover over the PCB bulk product waste and RCRA hazardous waste designed to meet the RCRA requirements would also meet these TSCA cover requirements.
PCB waste from building demolition	When a cleanup activity under this section includes use of a fence or a cap, the owner of the site must maintain the fence or cap in perpetuity.	PCB remediation waste at concentrations $\geq$ 50 ppm PCBs.	40 CFR § 761.61(a)(8)	Relevant and appropriate	In promulgation of the TSCA rule at 40 CFR § 761.61, EPA stated that Part 761 does not bind other cleanup programs such as CERCLA or RCRA; however, EPA expects that CERCLA cleanups would typically comply with one of the three cleanup options provided in § 761.61. Also, the PCBs found at the building demolition site are not from the release of PCBs as PCB remediation waste. Instead, the PCBs found at the building demolition site are PCB bulk product waste. Therefore, these regulations are not identified as applicable, but are identified as relevant and appropriate to PCBs present in bulk product waste. PCB bulk product waste with concentrations of PCBs exceeding 50 ppm will be disposed of off-site. PCB bulk product waste with concentrations at or less than 50 ppm will remain on site, under the cover. The cover over the PCB bulk product waste and RCRA hazardous waste designed to meet the RCRA requirements would also meet these TSCA cover requirements.
PCB waste from building demolition	PCB bulk product waste must be disposed of in accordance with (1) performance-based disposal, (2) disposal in solid waste	PCB bulk product waste means waste derived from	40 CFR § 761.62(c)	Relevant and appropriate	In promulgation of the TSCA rule at 40 CFR § 761.61, EPA stated that Part 761 does not bind other cleanup programs such as CERCLA or RCRA; however, EPA expects that CERCLA cleanups would typically comply

TABLE 2 (Continued)

**POTENTIAL FEDERAL ACTION-SPECIFIC APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS  
DES MOINES TCE SITE, DES MOINES, IOWA**

	landfills, or (3) risk-based disposal approval	manufactured products containing PCBs in a non-liquid state at any concentration at time of designation for disposal ≥ 50 ppm PCBs			with one of the three cleanup options provided in § 761.61. Therefore, this regulation, which is within Part 761, is not identified as applicable, but is identified as relevant and appropriate to PCBs bulk product waste. PCB bulk product waste with concentrations of PCBs exceeding 50 ppm will be disposed of off-site. PCB bulk product waste with concentrations at or less than 50 ppm will remain on site, under the cover.
<b>Clean Water Act</b>					
Construct covers over crushed building debris left on site	Construction activity that disturbs 1 acre or more must use best management practices to control stormwater discharges.	Construction activities encompassing at least 1 acre.	Clean Water Act § 402 40 CFR §122.44(k)(2) and (4)	Applicable	Demolition and construction of the covers will affect at least 1 acre, so the stormwater discharge requirements are applicable. Best management practices will be used to control stormwater discharge to nearby surface water bodies. See Table 3, Potential State ARARs, for a discussion of compliance with these Clean Water Act ARARs.

## Notes:

§	Section
ARAR	Applicable or relevant and appropriate requirement
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	<i>Code of Federal Regulations</i>
EPA	U.S. Environmental Protection Agency
IC	Institutional controls
LDR	Land disposal restriction
NESHAPS	National Emission Standards for Hazardous Air

Pollutants	
PCB	Polychlorinated biphenyl
ppm	Parts per million
RCRA	Resource Conservation and Recovery Act
TSCA	Toxic Substances Control Act
US	United States
U.S.C.	<i>United States Code</i>



TABLE 3

**POTENTIAL STATE ACTION-SPECIFIC APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS  
DES MOINES TCE SITE, DES MOINES, IOWA**

Action	Requirement	Prerequisite	Citation	Preliminary ARAR Determination	Comments
<b>ALTERNATIVES</b>					
<b>Building Demolition with Off-site Disposal (Alternative 2)</b>					
<b>Clean Water Act</b>					
Building demolition and construction of cover	Construction activities that disturb 1 acre or more must use best management practices to control stormwater discharges.	Construction activities that affect 1 acre or more.	Clean Water Act § 1342 40 CFR §122.44(k)(2) and (4)	Applicable	Building demolition and construction of the cover over contaminated soil and fill will affect more than 1 acre, so the stormwater discharge requirements are applicable. Best management practices will be used to control stormwater discharge to nearby surface water bodies.  Pursuant to CERCLA § 121(e), permits are not required for the portions of the remedial action that occur entirely on site. The stormwater discharge will occur entirely on site; therefore, a permit to discharge the stormwater is not required. However, the substantive provisions of Iowa General Permit 2 (Storm Water Management for Construction Activities) will be applied as a means of complying with Clean Water Act requirements.
<b>Iowa land Recycling Program and Response Action Standards</b>					
Technological controls	The purpose of a technological control is to effectively sever a pathway by use of technologies such that an applicable receptor could not be exposed to hazardous substances at concentrations above respective applicable target risk levels. Proposal for any technological control as a permanent response action option that would not reduce contaminant concentrations to at or below target risk levels must establish that the pathway to a receptor would be permanently severed or controlled.	A contaminated site enrolled in the Land Recycling Program	IAC § 137.7(1)	Relevant and appropriate	These requirements are not applicable because neither the building nor the site is enrolled in the Land Recycling Program. These requirements are potentially relevant and appropriate to the cover evaluated in Alternative 2 that would be used to prevent exposure to contaminated soil and fill remaining on site.

TABLE 3 (Continued)

**POTENTIAL STATE ACTION-SPECIFIC APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS  
DES MOINES TCE SITE, DES MOINES, IOWA**

Impose an IC	The purpose of an IC is to restrict access to or use of an affected area such that current or future receptors could not be exposed to hazardous substances. ICs can include: (1) a state or federal law or regulation, (2) a local ordinance, (3) a recorded contractual obligation, (4) informational devices, or (5) an environmental covenant pursuant to the Uniform Environmental Covenants Act.	A contaminated site enrolled in the Land Recycling Program	IAC § 137.7(2)	Relevant and appropriate	These requirements are not applicable to the ICs under evaluation because neither the building nor the site is enrolled in the Land Recycling Program. These requirements are potentially relevant and appropriate for establishing the ICs necessary to prevent human health exposure to contaminated soil and fill remaining on site.
Modify or terminate an IC or technological control	A participant or owner of property subject to an IC may seek approval from the department for removal, discontinuance, modification, or termination of an IC.	A contaminated site enrolled in the Land Recycling Program	IAC § 137.7(8)	Relevant and appropriate	These requirements are not applicable to the ICs under evaluation because neither the building nor the site is enrolled in the Land Recycling Program. These requirements are potentially relevant and appropriate for modifying or terminating ICs imposed on the site to prevent exposure to contaminated building debris remaining on site.
<b>Uniform Environmental Covenants Act</b>					
Prohibit future uses of or activities at the site	Land use and activity restrictions must be described and embodied in an environmental covenant recorded in every county in which any portion of the real property subject to the environmental covenant is located.	A land use or activity restriction necessary to prevent exposure to contamination	Title XI, Iowa Code, Chapter 455I	Applicable	Land use and activity restrictions are necessary to prevent exposure to contaminated building debris remaining on site, and to maintain the integrity of the final cover.

TABLE 3 (Continued)

**POTENTIAL STATE ACTION-SPECIFIC APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS  
DES MOINES TCE SITE, DES MOINES, IOWA**

Action	Requirement	Prerequisite	Citation	Preliminary ARAR Determination	Comments
<b>ALTERNATIVES</b>					
<b>Building Demolition with On-site Containment (Alternative 3)</b>					
<b>Clean Water Act</b>					
Building demolition and construction of covers	Construction activities that disturb 1 acre or more must use best management practices to control stormwater discharges.	Construction activities that affect 1 acre or more.	Clean Water Act § 1342 40 CFR §122.44(k)(2) and (4)	Applicable	Building demolition and construction of the covers will affect more than 1 acre, so the stormwater discharge requirements are applicable. Best management practices will be used to control stormwater discharge to nearby surface water bodies.  Pursuant to CERCLA § 121(e), permits are not required for the portions of the remedial action that occur entirely on site. The stormwater discharge will occur entirely on site; therefore, a permit to discharge the stormwater is not required. However, the substantive provisions of Iowa General Permit 2 (Storm Water Management for Construction Activities) will be used as a means of complying with Clean Water Act requirements.
<b>Iowa Land Recycling Program and Response Action Standards</b>					
Technological controls	The purpose of a technological control is to effectively sever a pathway by use of technologies such that an applicable receptor could not be exposed to hazardous substances at concentrations above respective applicable target risk levels. Proposal for any technological control as a permanent response action option that would not reduce contaminant concentrations to at or below target risk levels must establish that the pathway to a receptor would be permanently severed or controlled.	A contaminated site enrolled in the Land Recycling Program	IAC § 137.7(1)	Relevant and appropriate	These requirements are not applicable because neither the building nor the site is enrolled in the Land Recycling Program. These requirements are potentially relevant and appropriate to the cover evaluated in Alternative 3 that would be used to prevent exposure to contaminated building debris remaining on site.
Impose an IC	The purpose of an IC is to restrict access to or use of an affected area such that current or future	A contaminated site enrolled in the Land Recycling	IAC § 137.7(2)	Relevant and appropriate	These requirements are not applicable to the ICs under evaluation because neither the building nor the site is enrolled in the Land Recycling Program.

TABLE 3 (Continued)

**POTENTIAL STATE ACTION-SPECIFIC APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS  
DES MOINES TCE SITE, DES MOINES, IOWA**

	receptors could not be exposed to hazardous substances. ICs can include: (1) a state or federal law or regulation, (2) a local ordinance, (3) a recorded contractual obligation, (4) informational devices, or (5) an environmental covenant pursuant to the Uniform Environmental Covenants Act.	Program			These requirements are potentially relevant and appropriate for establishing the ICs necessary to prevent human health exposure to contaminated building debris remaining on site.
Modify or terminate an IC or technological control	A participant or owner of property subject to an IC may seek approval from the department for removal, discontinuance, modification, or termination of an IC.	A contaminated site enrolled in the Land Recycling Program	IAC § 137.7(8)	Relevant and appropriate	These requirements are not applicable to the ICs under evaluation because neither the building nor the site is enrolled in the Land Recycling Program. These requirements are potentially relevant and appropriate for modifying or terminating ICs imposed on the site to prevent exposure to contaminated building debris remaining on site.
<b>Uniform Environmental Covenants Act</b>					
Prohibit future uses of or activities at the site	Land use and activity restrictions must be described and embodied in an environmental covenant recorded in every county in which any portion of the real property subject to the environmental covenant is located.	A land use or activity restriction necessary to prevent exposure to contamination	Title XI, Iowa Code, Chapter 455I	Applicable	Land use and activity restrictions are necessary to prevent exposure to contaminated building debris remaining on site, and to maintain the integrity of the final cover.

## Notes:

§	Section
ARAR	Applicable or relevant and appropriate requirement
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	<i>Code of Federal Regulations</i>
IAC	<i>Iowa Administrative Code</i>
IC	Institutional control

## **5.0 DEVELOPMENT OF REMEDIAL ALTERNATIVES**

Tetra Tech evaluated three alternatives addressing buildings and slabs that remain at the site, applying the nine criteria described in CERCLA (EPA 1988). The first alternative, which serves as a baseline, is known as the “No Action” alternative. The second alternative is building demolition with off-site disposal (Figure 6). The third alternative is building demolition with on-site containment that includes crushing building material on site, spreading the material across the site, and covering the fill with a cap (Figures 7 and 8). The following sections describe these alternatives.

### **5.1 ALTERNATIVE 1 – NO ACTION (BASELINE)**

Alternative 1 is the CERCLA-required no-action alternative in which no remediation is undertaken. This alternative does not include additional land use controls, containment, removal, treatment, or other mitigating actions beyond what has already been put in place as a result of the 1996 ROD. It does include continued maintenance of the site as required by the 1996 ROD and 5-year reviews by EPA to evaluate effectiveness. Under Alternative 1, because no action is taken, the site remains unchanged. Building contaminants that pose risk to human health would remain in place. The no action alternative provides a baseline for comparison to the other remedial response alternatives. Alternative 1 would have minimal costs associated with required continued maintenance and 5-year reviews.

### **5.2 ALTERNATIVE 2 – BUILDING DEMOLITION WITH OFF-SITE DISPOSAL**

Alternative 2 includes demolition of all buildings and slab foundations remaining on site, and disposal of demolition debris at an off-site landfill. Alternative 2 would include removal of PCB-contaminated insulation and asbestos prior to demolition activities. After demolition activities, areas previously hosting the buildings and slab foundations would be backfilled with non-hazardous debris and capped with asphalt. Assumptions for Alternative 2 are as follows:

1. Collection of an estimated 100 samples is anticipated during the Asbestos Survey. Costs for this survey and report were estimated by application of the “RCRA Facility Investigation” technology in RACER. Assemblies were removed that did not apply.
2. Roofing tar and boiler/piping insulation contain asbestos, and will be abated prior to demolition of buildings. This will be classified as asbestos-containing material (ACM) and disposed of as special waste. This includes roofing at the Office Building, Production Building, and Buildings 1, 2, and 3; and boiler/piping insulation at Building 1.
3. Based on the 1996 FS, it is assumed that insulation at Buildings 2 and 3 contain PCBs (Black and Veatch 1996). Insulation will be removed prior to demolition of buildings and disposed of as RCRA hazardous waste at a RCRA Subtitle C landfill.

4. The Office Building and Production Building are assumed to have no contamination and can therefore be disposed of as non-hazardous waste at a local landfill.
5. The Maintenance Building and Building 4 are assumed to contain RCRA listed waste requiring disposal at a RCRA Subtitle C landfill.
6. All remaining slab foundations will be removed.
7. During demolition activities, metal materials (i.e. rebar, steel beams, etc.) will be separated and decontaminated by use of a decontamination facility pad and pressure washer. Metals will be recycled at a local scrap yard. It is assumed that the scrap yard will pay \$90 per ton of metal based on current prices as of February 16, 2017. Approximately 2,750 gallons of wash water will be generated during decontamination activities. Wash water will be considered hazardous.
8. For the purpose of this Focused FS, the following assumptions were made regarding the amount of metal within the structures on site:

Structure	Construction Material	Percent of Structure that Contains Metal
Slab Foundations	Reinforced Concrete	1%
Office Building	Masonry/Concrete	10%
Production Building (76%)	Masonry	10%
Production Building (24%)	Steel	100%
Building 1	Masonry	10%
Building 2	Masonry	10%
Building 3	Steel	100%
Walkway	Steel	100%

These assumptions are based on review of available photographs of the structures.

9. Demolition debris remaining after the above activities will be sampled to determine if it classifies as a RCRA characteristic waste. For the purposes of this Focused FS, 25 to 75% of the remaining demolition debris is assumed to be RCRA hazardous waste due to RCRA characteristic waste. RCRA hazardous waste will require disposal at a RCRA Subtitle C landfill. All remaining debris determined to be non-hazardous will be used as backfill for excavated slab areas or disposed of at a local landfill.
10. Demolition equipment will require decontamination. Equipment decontamination operations are anticipated to last 1 week. Costs include construction of a decontamination facility pad and disposal of wash water. Approximately 2,750 gallons of wash water will be generated during decontamination activities. Wash water will be considered hazardous.
11. Disposal of demolition debris containing RCRA listed and characteristic wastes will occur at a Toxic Substance Control Act (TSCA)-approved and RCRA Subtitle C landfill in Utah. Transportation by rail and disposal charges will be \$272.58 per ton, based on estimates received from disposal facilities.
12. Disposal of non-hazardous demolition debris will occur at the Metro Park East Landfill in Des

Moines, Iowa at a rate of \$38.29 per ton. Transportation by truck to the landfill will be \$21.46 per ton.

13. The volume to weight conversion factor for construction and demolition waste is 0.625 tons per cubic yard based on the Kansas Department of Health and Environment (KDHE) Bureau of Waste Management (KDHE 2010). An Iowa-specific weight conversion was not found.
14. Non-hazardous demolition debris will be used as fill in the building footprints that remain after removal of the buildings and slab foundations. This fill will then be covered with an asphalt cap to prevent exposure to soil that may be contaminated.
15. Asphalt cap repairs will occur every 3 years.
16. Institutional controls (IC) will be put in place to prevent exposure to any contamination that remains on site.
17. No soil will be removed as part of this alternative.
18. Land Disposal Restrictions (LDR) are applicable as appropriate.

### **5.3 ALTERNATIVE 3 – BUILDING DEMOLITION WITH ON-SITE CONTAINMENT**

Alternative 3 includes demolishing all buildings remaining on site, crushing the building debris, spreading the debris across the site, and covering the fill with a cap. Slab foundations will remain in place.

Building debris will be sampled to determine if it is RCRA characteristic hazardous waste or non-hazardous. Non-hazardous debris will be spread across the northern and western portions of the site and capped with asphalt. Hazardous debris will be spread across the southern portion of the site under EPA's Area of Contamination (AOC) policy, including the Maintenance Building and Building 4 slab foundations, and covered with a prescriptive cap following guidelines from EPA's "Technical Guidance Document: Final Covers on Hazardous Waste Landfills and Surface Impoundments" (EPA 1989) and EPA's "(Draft) Technical Guidance for RCRA/CERCLA Final Covers" (EPA 2004). The AOC policy allows for certain discrete areas of generally dispersed contamination to be considered RCRA units.

Metals, asbestos, and PCB-contaminated insulation will be removed prior to demolition activities.

Assumptions for Alternative 3 are as follows:

1. Collection of an estimated 100 samples is anticipated during the Asbestos Survey. Costs for this survey and report were estimated by application of the "RCRA Facility Investigation" technology in RACER. Assemblies were removed that did not apply.
2. Roofing tar and boiler/piping insulation contain asbestos, and will be abated prior to demolition of buildings. This will be classified as ACM and disposed of as special waste. This includes roofing at the Office Building, Production Building, and Buildings 1, 2, and 3; and boiler/piping insulation at Building 1.

3. Based on the 1996 FS, it is assumed that insulation at Buildings 2 and 3 contains PCBs (Black and Veatch 1996). Insulation will be removed prior to demolition of buildings and disposed of as hazardous waste at a RCRA Subtitle C landfill.
4. The Office Building and Production Building are assumed to be non-hazardous.
5. The Maintenance Building and Building 4 are assumed to contain RCRA listed waste.
6. All slab foundations will remain in place.
7. During demolition activities, metal materials (i.e. rebar, steel beams, etc.) will be separated and decontaminated by use of a decontamination facility pad and pressure washer. Metals will be recycled at a local scrap yard. It is assumed that the scrap yard will pay \$90 per ton of metal based on current prices as of February 16, 2017. Approximately 2,750 gallons of wash water will be generated during decontamination activities. Wash water will be hazardous.
8. For the purpose of this Focused FS, the following assumptions were made regarding the amount of metal within the structures on site:

Structure	Construction Material	Percent of Structure that Contains Metal
Office Building	Masonry/Concrete	10%
Production Building (76%)	Masonry	10%
Production Building (24%)	Steel	100%
Building 1	Masonry	10%
Building 2	Masonry	10%
Building 3	Steel	100%
Walkway	Steel	100%

These assumptions are based on review of available photographs of the structures.

9. Demolition debris remaining after the above activities will be sampled to determine if they are classified as a RCRA characteristic waste. For the purposes of this Focused FS, 25 to 75% of the remaining demolition debris is assumed to be hazardous due to RCRA characteristic waste.
10. Crushed materials will be spread on site and capped. Demolition debris determined to be hazardous will be spread on the southern portion of the site including the area where the foundations remain for the Maintenance Building and Building 4. The prescriptive cap will encompass approximately 3.6 acres and include 2 feet of low permeability clay, 60/1,000-inch (60 mil) high-density polyethylene (HDPE) liner, drainage netting, 36-inch protection layer, 12 inches of top soil, and a vegetative cover. To meet the guidelines for the maximum permeability of clay, 2% sodium bentonite would be added to the clay layer. The non-hazardous demolition debris will be spread across the northern and western portions of the site, and covered with an asphalt cap encompassing approximately 16.4 acres. The asphalt cap will consist of a 6-inch base course layer and a 3-inch topping that will be placed directly over the demolition debris.
11. Asphalt cap repairs will occur every 3 years.



12. Demolition equipment will require decontamination. Equipment decontamination operations are anticipated to last 1 week. Costs include construction of a decontamination facility pad and disposal of wash water. Approximately 2,750 gallons of wash water will be generated during decontamination activities. Wash water will be considered hazardous.
13. Disposal of PCB wastes will occur at a Toxic Substance Control Act (TSCA)-approved and RCRA Subtitle C landfill in Utah. Transportation by rail and disposal charges will be \$272.58 per ton, based on estimates received from disposal facilities.
14. The volume to weight conversion factor for construction and demolition waste is 0.625 tons per cubic yard based on KDHE Bureau of Waste Management (KDHE 2010). An Iowa-specific weight conversion was not found.
15. ICs will be put in place to prevent exposure to any contamination that remains on site.
16. No soil will be removed as part of this alternative.
17. LDRs are applicable as appropriate.

## **6.0 DETAILED ANALYSIS OF REMEDIAL ALTERNATIVES**

This section evaluates remedial alternatives applying EPA guidelines for detailed analysis of alternatives in feasibility studies (EPA 1988). The nine evaluation criteria are also called NCP criteria. The first two are called threshold criteria, the next five are called primary balancing criteria, and the last two are called modifying criteria. The modifying criteria, “state acceptance” and “community acceptance,” are evaluated after receipt of public comment.

### **6.1 ALTERNATIVE 1 – NO ACTION (BASELINE)**

The No Action alternative is required by the NCP and will serve as a comparative reference for other remedial alternatives.

#### **6.1.1 Overall Protection of Human Health and the Environment**

According to the most recent 5-year review of the site, Alternative 1 is protective of human health. However, due to changes in land use and potential for future development of the site, Alternative 1 is no longer protective of human health or the environment. Contaminated building materials would pose a risk to human receptors above acceptable levels.

#### **6.1.2 Compliance with ARARs**

Alternative 1 would not comply with ARARs.

#### **6.1.3 Long-Term Effectiveness and Permanence**

Alternative 1 would not be effective in the long term, and would not be a permanent remedy. Risk posed by contaminated building materials would remain unmitigated.

#### **6.1.4 Reduction of Toxicity, Mobility, or Volume through Treatment**

Alternative 1 does not include treatment and would therefore not reduce toxicity, mobility, or volume through treatment.

#### **6.1.5 Short-Term Effectiveness**

Alternative 1 would not provide any short-term effectiveness, but because it does not include construction, there would be no short-term risk from construction-related activities.

### **6.1.6 Implementability**

Alternative 1 would require minimal effort to implement as it is the current remedy for the site. However, it would face administrative hurdles because it no longer addresses risk.

### **6.1.7 Cost**

Minimal cost is associated with Alternative 1 for required continued maintenance and 5-year reviews.

### **6.1.8 State Acceptance**

Alternative 1 is the current accepted remedy for the site. However, due to changes in land use and potential future development, it is unlikely that Alternative 1 would continue to receive state acceptance because it no longer mitigates risk at the site.

### **6.1.9 Community Acceptance**

Alternative 1 is the current accepted remedy for the site. However, due to changes in land use and potential future development, it is unlikely that Alternative 1 would continue to receive community acceptance because it no longer mitigates risk at the site.

## **6.2 ALTERNATIVE 2 – BUILDING DEMOLITION WITH OFF-SITE DISPOSAL**

Alternative 2 involves removal of building materials, including contaminated materials that contain a RCRA characteristic or listed waste. Building materials determined to be non-hazardous would be used as fill in the areas formerly hosting the buildings and slab foundations, followed by an asphalt cap (see Figure 6). All remaining hazardous and non-hazardous waste would be transported to an off-site landfill. In addition, the following ICs would be required: (1) groundwater beneath the premises shall not be used, (2) vapor intrusion mitigation systems shall be installed in all buildings erected on site, (3) cap shall not be disturbed without prior written approval from EPA, and (4) all soil removed from the site is suspected to be contaminated and shall be disposed of according to RCRA regulations.

### **6.2.1 Overall Protection of Human Health and the Environment**

Alternative 2 rates high under this criterion. This alternative permanently reduces long-term risk to human receptors, and restores the area occupied by buildings to beneficial use. Contaminated material would be disposed of off-site. Short-term risk would be mitigated through safe work practices.

### **6.2.2 Compliance with ARARs**

Alternative 2 would comply with ARARs.

### **6.2.3 Long-Term Effectiveness and Permanence**

Alternative 2 rates high under this criterion because building materials posing risk would be removed. Contaminated soil would not be addressed by building removal; however risk would be mitigated indirectly through an asphalt cap. Groundwater monitoring and treatment are ongoing as part of the current ROD (EPA 1996). This alternative has a high degree of permanence. Contamination from building materials would not return after removal of the material because the known sources have been removed.

### **6.2.4 Reduction of Toxicity, Mobility, or Volume through Treatment**

Alternative 2 would reduce toxicity and volume of contaminants at the source through off-site disposal in a secure and regulated landfill.

### **6.2.5 Short-Term Effectiveness**

Alternative 2 would have moderate short-term effectiveness. Some risk to workers and the community would be posed during building demolition. Risk to workers would be mitigated through safe work practices, including use of personal protective equipment, dust suppression, and air monitoring. Potential for spill of contaminated material, and increased potential for vehicle collisions due to construction traffic, would be the primary risks to the community.

### **6.2.6 Implementability**

Alternative 2 would have high implementability. Technologies and skills necessary to implement the remedy would be readily available. Buildings and foundations could be demolished, crushed, or cut to required sizes and removed with reasonable accuracy. Similarly, non-hazardous demolition debris and asphalt pavement could be used for backfill. Minor site-specific challenges may emerge during demolition and removal. Building demolitions, and removal and placement of fill and an asphalt cap are expected to take 3 months.

### **6.2.7 Cost**

The cost of Alternative 2 in 2017 dollars is estimated to be between \$11,608,000 and \$13,226,000 for capital cost depending on the amount of demolition debris determined to be hazardous, \$55,000 for ICs, and \$1,330,000 for operation and maintenance (O&M) over 30 years. The present value of future O&M is based on an annual discount rate of 0.7 percent obtained from Office of Management and Budget (OMB) Circular A-94 (OMB 2016). The estimated cost is sensitive to the volume of building material that must be removed off site and the quantity of building material determined to be hazardous due to RCRA characteristic or listed waste.

Potential cost savings associated with this alternative are as follows:

- A vegetative cap could be used in place of an asphalt cap for Alternative 2. This would include 18 inches of soil and vegetation and would result in a potential cost savings of approximately \$1,554,000. The maintenance associated with the asphalt cap, such as seal coating and crack sealing, would be eliminated. However, maintenance for the vegetative cap would be required including re-seeding, fertilization, and erosion repair.

### **6.2.8 State Acceptance**

State acceptance will be evaluated after receipt of public comment.

### **6.2.9 Community Acceptance**

Community acceptance will be evaluated after receipt of public comment.

## **6.3 ALTERNATIVE 3 – BUILDING DEMOLITION WITH ON-SITE CONTAINMENT**

Alternative 3 involves demolishing the buildings, crushing building debris, and leaving it on site. All slab foundations would remain in place. Demolition debris determined to be non-hazardous would be placed in the northern and western portions of the site and overlain by an asphalt cap (see Figures 7 and 8). The asphalt cap would encompass approximately 16.4 acres and consist of a 6-inch base granular layer and 3-inch hot mix asphalt layer. Approximately 1.6 to 1.8 feet of demolition debris would be used as a foundation layer, depending on the quantity of non-hazardous waste (25-75%). Demolition debris determined to be hazardous would be placed in the southern portion of the site and overlain by a RCRA-compliant cap that would consist of 2 feet of low permeability clay, 60-mil HDPE liner, drainage netting, 36-inch protection layer, 12 inches of top soil, and a vegetative cover (see Figures 7 and 8). This cap would encompass approximately 3.6 acres and would include approximately 0.5 to 1.4 feet of

demolition debris as a foundation layer, depending on the quantity of hazardous waste (25-75%). ICs would prevent or control actions that might compromise the remedy or otherwise expose receptors to buried contamination. Shallow groundwater would be monitored if soil-to-groundwater leaching is found to be a concern during the remedial design. The following ICs would be required: (1) groundwater beneath the premises shall not be used, (2) vapor intrusion mitigation systems shall be installed in all buildings erected on site, (3) caps shall not be disturbed without prior written approval from EPA, and (4) all soil removed from the site is suspected to be contaminated and shall be disposed of according to RCRA regulations.

### **6.3.1 Overall Protection of Human Health and the Environment**

Alternative 3 rates moderate to high under this criterion. This alternative reduces long-term risk to human receptors. However, the alternative would require maintenance and implementation of ICs to remain protective. Contaminants in building materials would be contained on site rather than removed. PCBs in building materials, except for insulation, are at concentrations less than 50 parts per million, based on results of previous sampling activities. Therefore, this material can remain on site as bulk product waste. The already low short-term risk would be further mitigated through safe work practices.

### **6.3.2 Compliance with ARARs**

Alternative 3 would comply with ARARs.

### **6.3.3 Long-Term Effectiveness and Permanence**

Alternative 3 rates moderate to high under this criterion. Burying contaminated building materials under clean fill would isolate it from the environment and human receptors. It is unlikely that natural processes could uncover buried contaminated building material; human actions that could uncover this material would be prohibited or controlled by ICs. The RCRA-compliant caps would limit infiltration of water through contaminated building materials. Leaching from building debris to groundwater is unlikely unless groundwater rises substantially. Groundwater is currently monitored as part of the ROD (EPA 1996). As indicated by this monitoring, pesticide contamination in soil and fill below the buildings has not migrated to groundwater over the last few decades. The caps would erode and settle over time and would require periodic grade correction to maintain their function. The caps would be designed to limit leaching. As such, this alternative would protect groundwater in the long term.

#### **6.3.4 Reduction of Toxicity, Mobility, or Volume through Treatment**

Alternative 3 does not involve treatment and therefore would not reduce toxicity, mobility, or volume of contaminants through treatment.

#### **6.3.5 Short-Term Effectiveness**

Alternative 3 rates moderate to high for short-term effectiveness. Potential for exposure of workers or the community to contaminated building materials would be small because most material would be left on site. There would be some potential for community exposure when asbestos, PCBs, and metals are removed from the site for disposal/recycling. Increased risk of vehicular collisions would be posed because of construction traffic, removal of some building material, and transport of clean fill and asphalt to the site.

#### **6.3.6 Implementability**

Alternative 3 rates moderately high for implementability. The remedy is straightforward, but may require specialized equipment such as bulldozers and backhoes to crush building debris. It would take approximately 4 months to implement. Alternative 3 involves demolishing buildings, removing metals, crushing concrete for fill, and installing RCRA-compliant caps.

#### **6.3.7 Cost**

The cost of Alternative 3 in 2017 dollars is estimated at \$15,321,000 for capital cost, \$55,000 for ICs, and \$2,846,000 for O&M cost for 30 years. The present value of future O&M is based on an annual discount rate of 0.7 percent obtained from OMB Circular A-94 (OMB 2016). The estimated cost is sensitive to the design of the cap and the associated repairs. The location of the on-site disposal may vary from that depicted in Figures 7 and 8 due to redevelopment. However, any costs associated with changing the location of the disposal would be the responsibility of the future developer.

Potential cost savings associated with this alternative are as follows:

- A vegetative cap could be used in place of an asphalt cap for Alternatives 3. This would include 18 inches of soil and vegetation and would result in a potential cost savings of approximately \$3,393,000. The maintenance associated with the asphalt, such as seal coating and crack sealing, would be eliminated. However, maintenance for the vegetative cap would be required including re-seeding, fertilization, and erosion repair.
- Non-hazardous demolition debris could potentially be disposed of in the SPA instead of spread

across the site. This would result in a potential savings of approximately \$2,309,000 for Alternative 3 and approximately \$910,000 for Alternative SP3 for the SPA. Cost saving for the SPA would be due to a reduction in the amount of fill required. Cost savings for Alternative 3, building demolition with on-site containment, would be due to a reduction in the asphalt cap size and seal coating every three years. This is based on the assumption that a 12 acre asphalt cap would be needed in place of the 16.4 acre cap proposed in this report.

- Non-hazardous demolition debris could potentially be disposed of on-site in the form of a berm along the edge of the property, approximately 3,615 feet in length. The berm would be approximately 4.5 feet high and would include 3 feet of debris, 18 inches of soil (6 inches each of clay, fill, and topsoil), and a vegetative cover. The berm would be approximately 78.5 feet wide with a concrete sidewalk, 10 feet wide, for use as a walking path. A small asphalt cap, approximately 2.3 acres in size would still be required to cover the slab foundations of Buildings 1, 2, and 3. This alternative would result in a potential cost savings of approximately \$4,843,000. Potential additional costs such as drainage design and permitting have not been included.

### **6.3.8 State Acceptance**

State acceptance will be evaluated after receipt of public comment.

### **6.3.9 Community Acceptance**

Community acceptance will be evaluated after receipt of public comment.



## 7.0 COMPARISONS OF REMEDIAL ALTERNATIVES ACCORDING TO REGULATORY CRITERIA

Tetra Tech compared the three remedial alternatives detailed in Section 6.0 according to nine regulatory criteria:

1. Overall protection of human health and the environment
2. Compliance with ARARs
3. Long-term effectiveness and permanence
4. Reduction of toxicity, mobility, or volume through treatment
5. Short-term effectiveness
6. Implementability
7. Cost
8. State acceptance
9. Community acceptance.

The results are summarized in Table 4.

**TABLE 4**  
**SUMMARY OF FEASIBILITY OPTIONS**

Nine Criteria	Alt. 1: No Action	Alt. 2: Building Demo with Off-site Disposal	Alt. 3: Building Demo with On-site Containment
1. Protection	No.	Yes. Ranks High	Yes. Moderate to High
2. ARARs	No. Does not comply	Yes.	Yes.
3. Long-term Effect.	Not effective	Yes. Ranks High	Yes. Moderate to High
4. Reduction of Toxicity	No.	Yes.	No. Would not reduce toxicity, mobility
5. Short-term Effect.	Not effective, but no construction risk	Yes. Moderate	Yes. High
6. Implementability	Yes. Minimal effort required	Yes. High	Yes. Moderate to High
7. Cost	Minimal cost	Capital: \$11,608,000 to \$13,226,000 ICs: \$55,000 O&M: \$1,330,000 Total: \$12,993,000 to \$14,611,000	Capital: \$15,321,000 ICs: \$55,000 O&M: \$2,846,000 Total: \$18,222,000
8. State Acceptance	Unlikely. TBD	TBD	TBD
9. Community Acceptance	Unlikely. TBD	TBD	TBD

Notes:

IC Institutional controls  
TBD To be determined

O&M      Operation and maintenance

Based on results of this Focused FS, No Action (Alternative 1) no longer complies with many of the nine criteria because it does not actively seek to reduce or eliminate risk to human health and the environment based on changes in land use and potential for future development of the site. It is the least expensive because minimal effort would be required to implement.

Building demolition with on-site containment (Alternative 3) satisfies many of the nine criteria, but is the most expensive. Building demolition with off-site disposal (Alternative 2) satisfies more of the nine criteria, including reducing toxicity and mobility of COCs, and is less expensive than Alternative 3.

Details of cost assumptions are presented in Appendix A. Figures 6, 7, and 8 show conceptual models of the remedial alternatives—Alternatives 2 and 3. State and community acceptance are not known and could influence stakeholder decision-making.

## **8.0 SUMMARY AND CONCLUSIONS**

Tetra Tech was tasked by EPA under EPA START 4 Contract No. EP-S7-13-06, Task Order No. 0144 to update—by addendum—the Des Moines TCE FS to prepare a Focused FS of removal of buildings and foundations. The site is in south-central Des Moines on the east side of the Raccoon River. The property is owned by DICO, and contamination at the site resulted mainly from DICO's operations over 40 years that included steel wheel manufacturing, and chemical and pesticide formulation.

Pesticides detected in the Maintenance Building and Building 4 are RCRA listed wastes because of DICO's previous regulated activities of pesticide formulation.

Tetra Tech evaluated three remedial alternatives: (1) "No Action," which is the baseline alternative; (2) removing all building materials, with the debris sent off site to a regulated disposal facility; and (3) demolishing the buildings, crushing all building debris that would then be left on site, spreading the material across the site, and covering the fill with a cap. Details of these remedial alternatives are presented in Section 6.0. Remedial alternatives were compared to nine regulatory criteria in Section 7.0.

Based on results of this Focused FS, No Action (Alternative 1) no longer complies with many of the nine criteria because it does not actively seek to reduce or eliminate risk to human health and the environment based on changes in land use and potential for future development of the site. It is the least expensive because minimal effort would be required to implement.

Building demolition with on-site containment (Alternative 3) satisfies many of the nine criteria, but is the most expensive. Building demolition with off-site disposal (Alternative 2) satisfies more of the nine criteria, including reducing toxicity and mobility of COCs, and is less expensive than Alternative 3.

## 9.0 REFERENCES

- Black & Veatch Special Projects Corp. 1996. Final Feasibility Study for the Des Moines TCE Site Operable Unit Nos. 2 and 4, Des Moines, Iowa. May 30.
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## FIGURES

## **BUILDING SAMPLE RESULT TABLES**

**APPENDIX A**  
**COST ESTIMATE**